

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW, et al.

Plaintiffs

v.

1:04-cv-00397-GBD

THE PALESTINE LIBERATION ORGANIZATION, et al.

Defendants

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CONSENT MOTION TO ENLARGE

Now come the plaintiffs with the consent of the defendants¹ and hereby move to (1) enlarge the briefing schedule and (2) reschedule the oral argument scheduled for January 17, 2007.

On October 4, 2006, this Court approved a briefing schedule for the subject-matter jurisdiction issue raised by the defendants in their opposition to plaintiffs' motion for entry of default judgment.

Counsel for the parties have communicated by email and are in agreement to enlarge the schedule previously set by the Court, which will necessarily require rescheduling the oral argument date.

Enlargement is necessary as a result of plaintiffs' counsels schedule which has included: (1) several out of state court appearances, (2) preparation for a trial during the first week of

¹ In the course of email exchanges between counsel in which he gave defendants' consent to an enlargement, Attorney Schilling stated his preference that plaintiffs file a consent motion rather than a stipulation. Accordingly, a slightly abbreviated but substantively identical version of this motion was sent emailed to him on December 11, 2006, for comments, if any. He did not respond.

January and (3) several briefing deadlines in both federal district and appellate courts as well as state courts. Thus it has been impossible to comply with the current briefing schedule.

Enlargement of the briefing schedule will not cause harm or prejudice to any party.

Consequently, the parties respectfully request that the Court approve the following revised schedule and adjourn the hearing previously scheduled for January 17, 2006:

1. Plaintiffs' brief to be filed by December 20, 2006.
2. Defendants' response to be filed by February 5, 2007.
3. Oral argument in mid-February.

Plaintiffs,
By their Attorneys,

/s/ David Strachman
David Strachman
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CERTIFICATION

I hereby certify that on the 20th day of December, 2006, I served via ECF and email a true copy of the within to:

Lawrence W. Schilling
Ramsey Clark
37 West 12th Street – 2B
New York, NY 10011

/s/David Strachman
